

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
Miami Division

FILED BY _____ D.C.

Case No. 03-CV-22046 - *John* JUL 26 PM 5:31

JUAN A. SALINAS
and LUCILA FUENTES,

Plaintiffs,

vs.

SUE ANN RAMSEY
and HILDA RAMSEY,

Defendants.

CLARENCE MADDOX
CLERK U.S. DIST. CT.
S.D. OF FLA - MIA

AFFIDAVIT OF JON D. RANKIN

STATE OF FLORIDA }
COUNTY OF ORANGE } S.S.

BEFORE ME, the undersigned authority, personally appeared JON D. RANKIN, who, after being duly sworn, deposes and says as follows:

1. My name is JON D. RANKIN and I am familiar with the facts set forth herein.
2. I am employed as a paralegal by N. James Turner, Esquire, P.A., counsel for Defendant, HILDA RAMSEY, in the above-captioned matter.
3. Our offices have had no contact whatsoever from either Defendant in the above-referenced matter since January 20, 2004.
4. I have personally made several attempts, by U.S. Mail, telephone and e-mail, to contact Defendant, HILDA RAMSEY, but have not received a reply. The last known address we have for Defendant, HILDA RAMSEY, is:

3106 South Semoran Boulevard
Apartment #4
Orlando, FL 32822.

5. My last telephonic contact with either Defendant was on January 14, 2004, when I spoke with Defendant, SUE ANN RAMSEY.^{1/} During that conversation: (1) I spoke with Defendant, SUE ANN RAMSEY, regarding this Court's order dated January 5, 2004; (2) Defendant SUE ANN RAMSEY, told me that her mother was in Illinois undergoing cancer treatments; (3) I requested the names and addresses of individuals that

^{1/} Defendant, SUE ANN RAMSEY, has been our contact person for Defendant, HILDA RAMSEY, due to Defendant, HILDA RAMSEY, being unable to adequately respond due to her treatments for cancer.

would have knowledge of the facts of this case; and, (4) Defendant, SUE ANN RAMSEY, requested that I send her counsel for the Plaintiffs' address. Directly after my conversation with Defendant, SUE ANN RAMSEY, I e-mailed her counsel for the Plaintiffs' address.^{2/}

6. On January 20, 2004, Defendant, SUE ANN RAMSEY, e-mailed me the witness information I requested on January 14, 2004. In her e-mail, Defendant, SUE ANN RAMSEY, stated that her mother was in "Illinois undergoing her cancer treatments."^{3/}

7. Thereafter, I contacted the witnesses listed by Defendant, SUE ANN RAMSEY. Based upon the information I received from those witnesses, on March 30, 2004, I drafted an Affidavit to be signed by Defendant, HILDA RAMSEY, and forwarded it via e-mail to Defendant, SUE ANN RAMSEY, requesting that she have Defendant, HILDA RAMSEY, execute the Affidavit.^{4/} As of the date of this Affidavit, we have not received a reply to this message, and an executed Affidavit has not been received by our offices.

8. On May 1, 2004, our office sent out its billing statements. Thereafter, on May 14, 2004, we received Defendant, HILDA RAMSEY's billing statement returned as being undeliverable—"unable to forward." On that same date, I e-mailed Defendant, SUE ANN RAMSEY, requesting that she provide me with a current address and telephone number.^{5/} As of the date of this Affidavit, we have not received a reply.

9. On June 3, 2004, our office sent out our billing statements. And, again, it was returned.^{6/}

10. On June 9, 2004, I did a search on Auto TrackXP®, and discovered that Defendant, HILDA RAMSEY, maintains an Illinois driver's license.^{7/} Upon further review of the report, I found the following address for Defendant, HILDA RAMSEY:

^{2/} See Exhibit "A" attached hereto.

^{3/} See Exhibit "B" attached hereto.

^{4/} See Exhibit "C" attached hereto.

^{5/} See Exhibit "D" attached hereto.

^{6/} See Exhibit "E" attached hereto.

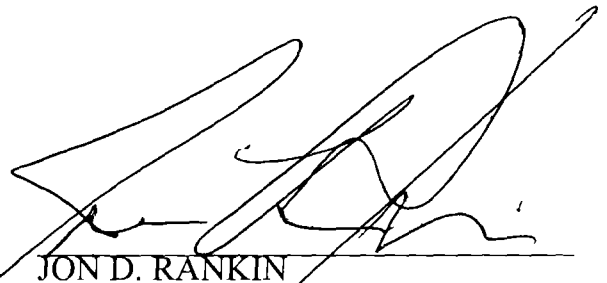
^{7/} See Exhibit "F" attached hereto.

501 E Franklin 12
Taylorville, IL 62568.

11. On June 17, 2004, I sent a letter to the address set forward in the preceding paragraph to Defendant, HILDA RAMSEY, with an enclosed Affidavit.^{8/} As of the date of this Affidavit, the letter has not been returned, and we have not received the executed Affidavit from Defendant, HILDA RAMSEY.

FURTHER AFFIANT SAYETH NAUGHT.

Dated this 20th day of July, 2004.



JON D. RANKIN

The foregoing instrument was acknowledge before me this 20th day of July, 2004, by JON D. RANKIN, who is personally known to me or who has produced a Florida Driver's License as identification and who did take an oath.



Deborah M Wolfe
My Commission DD139606
Expires September 24, 2006

Notary Public *Deborah M. Wolfe*
Name (printed or stamped) DEBORAH M. WOLFE
My Commission Expires: 9/24/06
Commission No.: DD139606

^{8/} See Exhibit "G" attached hereto.

Exhibit A

Jon Rankin

From: "Jon Rankin" <lawjdr@earthlink.net>
To: "Sue Ann Ramsey" <jeanbaracatusa@aol.com>
Sent: Wednesday, January 14, 2004 2:04 PM
Subject: Attorney Address

J.H. Zidell, Esq.
J.H. Zidell, Esq., P.A.
300-71st Street
Suite 605
Miami Beach, Florida 33141

Jon D. Rankin, Paralegal
Law Offices of N. James Turner, Esq.
200 East Robinson Street
Suite 1110
LAW
Orlando, Florida
(407) 422-6464 (voice)
(407) 422-6516 (fax)

CONCENTRATING IN EMPLOYMENT

<http://www.njtlaw.com/>

Please note: The information contained in this e-mail may be confidential and privileged and is intended only for the individual or entity to which it is addressed. If you are not the intended recipient, any use, dissemination or copy of this communication is strictly prohibited. If you received this communication in error, please notify us immediately at the address or telephone number listed below and return the original message to us.
Thank you for your cooperation.

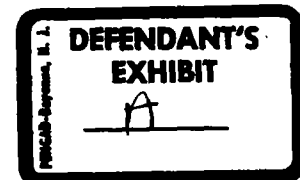


Exhibit B

Jon Rankin

From: <JeanBaracatUSA@aol.com>
To: <Lawjdr@earthlink.net>
Sent: Tuesday, January 20, 2004 11:36 PM
Subject: Hilda Ramsey

Hello John,

#1 Listed below are the two previous employees that will attest to my mother's non- involvement in Ramsey Design Company:
Cecilia Wisniewske
2861 Citron Dr.
Longwood, Fl. 32779
Bookkeeper for RDC since 1994
ceciliawis@aol.com

Tina Vinci
Deerfield Beach, Fl
.Office Manager for the past two years
(I will get her address if you need it, my records are in storage and I forgot to ask her when I spoke to her on the phone today.)
tvdl2@aol.com

#2 Would it be better to state that my mother is in her home in Illinois as that is where she is undergoing her cancer treatments rather than Orlando so they would have to go there to take her deposition? Please discuss with me.

#3 I need to talk to you about the \$610.72 billing I received from your office. I certainly have no problem with the amount considering all of the kindness and consideration you have shown me. I realize that we have another eight weeks or so to conclude this case and I am anxious that there will be substantial additional costs for that time frame. Can you give me some idea of how much more expense will be involved before we are finished?

Most importantly, I do not have that amount of money to pay at once. I will have to send to you in \$100.00 to \$200.00 increments over a couple of months to pay it off. Is that acceptable to you?

I am embarrassed about this but I thought when I retained Mr. Turner that I was told that there would be minor additional expenses of a couple of hundred dollars and I did not anticipate this bill with my more- than- restricted- funds at this time. I am working hard at my new business and am hopeful that I am going to start generating more money within the next eight weeks. Therefore, I may be able to pay the balance in one payment during that time frame.

Please let me know if you can work with me on this.

Sincerely,
Sue Ann Ramsey



Exhibit C

Jon Rankin

From: "Jon Rankin" <lawjdr@earthlink.net>
To: "Sue Ann Ramsey" <JeanBaracatUSA@aol.com>
Cc: "Jim Turner" <njtlaw@earthlink.net>
Sent: Tuesday, March 30, 2004 3:48 PM
Attach: Affidavit of Hilda Ramsey.doc
Subject: Hilda Ramsey

Attached hereto is an Affidavit we for your mother to sign. Please have her signature notarized and return the original notarized document back to me as soon as possible. Should you have any questions regarding this matter, please call me.

Jon D. Rankin, Paralegal
Law Offices of N. James Turner, Esq.
200 East Robinson Street
Suite 1110
Orlando, Florida
(407) 422-6464 (voice)
(407) 422-6516 (fax)

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LAW

<http://www.njtlaw.com/>

Please note: The information contained in this e-mail may be confidential and privileged and is intended only for the individual or entity to which it is addressed. If you are not the intended recipient, any use, dissemination or copy of this communication is strictly prohibited. If you received this communication in error, please notify us immediately at the address or telephone number listed below and return the original message to us.
Thank you for your cooperation.



7/20/2004

JAMES TURNER, ESQ. P. A.

ATTORNEY AT LAW
EOLA PARK CENTRE
200 EAST ROBINSON STREET
SUITE 1110
ORLANDO, FLORIDA 32801-4334

TELEPHONE (407) 422-6464
TELECOPIER (407) 422-6516

June 17, 2004

Ms. Hilda Ramsey
501 E Franklin 12
Taylorville, IL 62568

Re: *Hilda Ramsey, et al. adv. Juan A. Salinas, et al.*
Our File No. 1071-01

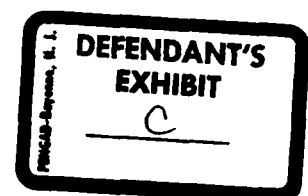
Dear Ms. Ramsey:

Enclosed herewith is a self-explanatory affidavit. Please have the enclosed document notarized and send the original notarized document back to me in the enclosed self-addressed, self-stamped envelope. Thank you very much.

Very truly yours,

Jen D. Rankin
Paralegal

NJT/jdr
Enclosure
cc: N. James Turner



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Miami Division

Case No. 03-CV-22046

JUAN A. SALINAS
and LUCILA FUENTES,

Plaintiffs,

vs.

SUE ANN RAMSEY
and HILDA RAMSEY,

Defendants.

_____ /

AFFIDAVIT OF HILDA RAMSEY

STATE OF _____)

) S.S.

COUNTY OF _____)

BEFORE ME, the undersigned authority, personally appeared HILDA RAMSEY,
who, after being duly sworn, deposes and says as follows:

1. My name is HILDA RAMSEY and I am familiar with the facts set forth herein.
2. The Plaintiffs, JUAN A. SALINAS and LUCILA FUENTES, have never been employed by any corporation that I have served as either an officer or director.
3. I have never ran the day-to-day business operations of any corporation employing either of the Plaintiffs, JUAN A. SALINAS and LUCILA FUENTES.
4. I have never employed either of the Plaintiffs, JUAN A. SALINAS and LUCILA FUENTES, in any capacity.
5. I have not been responsible for the payment of wages to the Plaintiffs, JUAN A. SALINAS and LUCILA FUENTES, at any time.

FURTHER AFFIANT SAYETH NAUGHT.

Dated this _____ day of June, 2004.

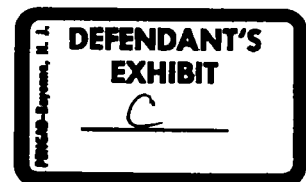


Exhibit D

Exhibit E

N. James Turner, Esq., P.A.
Eola Park Centre
9 East Robinson St., Ste. 1110
Orlando, Florida 32801-4334



1730 U.S. POSTAGE PB5566923
4050 \$00.37 JUN 03 2004
0108 MAILED FROM ZIP CODE 32801

Hilda E. Ramsey
3106 South Semoran Blvd.
Apt. #4
Orlando FL 32809

NIXIE 327 1 24 06/14/04

RETURN TO SENDER
ATTEMPTED - NOT KNOWN
UNABLE TO FORWARD

BC: 32801196285

32822 + 32801196285

1401-01468-04-29

Exhibit F

[AutoTrack Home](#) [Feedback](#) [Results Manager](#) [New Search](#) [Sign Off](#) [Online Support](#) [Permissibl](#)

Detail

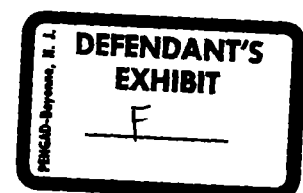
Drivers of the Nation®



Due to privacy regulations instituted by individual states, some driver license searches and data may not be available.

[Order a Report based on this Detail | Previous Screen](#)

Driver:	HILDA E RAMSEY ↗	Driver License Number:	R5203251961
Address:	501 E FRANKLIN ST TAYLORVILLE, IL 62568 ↗	Issued in:	IL
DOB:	01/18/1919 ↗	Original Issue:	
Age:	85	Expires On:	
Class:		Sex:	FEMALE
Height:		Restrictions:	
Hair Color:		Weight:	
SSN:	350-09-XXXX	Eye Color:	
SSN WAS ISSUED IN ILLINOIS BETWEEN 1936 AND 1951			



Results Manager Hide Navigation Links

National Comprehensive Report

Compiled on 6/09/2004 at 2:09PM

Reference: None Entered

User-Supplied Information

Last
Name: **RAMSEY**

First
Name: **HILDA**

Middle
Initial: **E**

SSN: **350-09-7388**

DOB: **1/18/1919**

Address
1: **590 SW 9TH TE**

POMPANO BEACH, FL 33069

Address
2: **501 E FRANKLIN 12**

TAYLORVILLE, IL 62568

Sections Available in Report

Possible AKAs for Subject

Possible Other Social Security Numbers Associated with Subject

Possible Driver Licenses

Possible Addresses Associated with Subject

Phone Listings for Subject's Addresses

Possible Real Property Ownership

